

That from sometime in or about January 2022, and continuously thereafter up to and including the date of this Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]
[REDACTED]
[REDACTED]
Samantha Reyes

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute mixtures or substances containing detectable amounts of a Schedule 1 controlled substance, to wit: ADB-BUTINACA, and MDMB-4en-PINACA, a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(c); knowing that the substance was intended for human consumption as provided in 21 U.S.C. § 813.

All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846.

Count Two

Violation: 18 U.S.C. § 1956(h)
(Conspiracy to Commit Money
Laundering in Violation of 18
U.S.C. § 1956(a)(1)(B)(i))

That from sometime in or about January 2022 and continuously thereafter up to and including the date of this Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]
[REDACTED]
[REDACTED]
Samantha Reyes

defendants, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand

Jury, to commit certain offenses against the United States, to-wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with Intent to Distribute a Controlled Substance, to-wit: controlled substance analogues, as described in Count One of this Indictment, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

Count Three

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with Intent
to Manufacture, Distribute and
Dispense A Controlled Substance
Analogue)

That from sometime in or about January 2022, and continuously thereafter up to and including the date of this Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute mixtures or substances containing detectable amounts of a Schedule 1 controlled substance, to wit: ADB-BUTINACA, and MDMB-4en-PINACA, a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(c); knowing that the substance was intended for human consumption as provided in 21 U.S.C. § 813.

All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846.

Count Four

Violation: 18 U.S.C. § 1956(h)
(Conspiracy to Commit Money
Laundering in Violation of 18
U.S.C. § 1956(a)(1)(B)(i))

That from sometime in or about January 2022 and continuously thereafter up to and including the date of this Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]

defendants, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, Conspiracy to Possess

with Intent to Distribute a Controlled Substance, to-wit: controlled substance analogues, as described in Count Three of this Indictment, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

A TRUE BILL

GRAND JURY FOREPERSON

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

CHRISTOPHER T. RAPP
Assistant United States Attorney

Date

Counts Two and Four

Violation: 18 U.S.C. § 1956(h)

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years if the conspiracy is to violate 18 U.S.C. § (a)(1)(B)(i);

Special Assessment: \$100.00